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U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
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UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF MICHIGAN
LANSING DIVISION

Robert P. Hollingsworth III, Plaintiff

v.
Scott Bessent, Secretary of the Treasury; Joshua Fisher, Director of the Office of
Administration; the Executive Office of the President (EOP); and the United States
Department of the Treasury, Defendants

1:25-cv-00234
Robert J. Jonker
U.S. District Judge

Case No.:
Judge:

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS AND CONSTITUTIONAL RIGHTS

I. INTRODUCTION

1. I, **Robert P. Hollingsworth III**, an African-American male residing in Lansing, Michigan, bring this action as a private citizen under **42 U.S.C. § 1983** and **Bivens v. Six Unknown Named Agents**, to challenge the unconstitutional and discriminatory actions of the Defendants. These actions directly harm me as a recipient of government assistance (Section 8 housing, food stamps) and as an unemployed individual reliant on federal programs.
2. This lawsuit addresses the **unprecedented and unlawful cutting of federal funds** by the Defendants, which was done without Congressional approval and violates constitutional principles of **separation of powers, due process under the Fifth Amendment, and equal protection under the Fourteenth Amendment**.
3. I also allege that these actions are rooted in **racial discrimination**, as they disproportionately harm people of color and marginalized communities, while dismantling DEI programs designed to promote equity and inclusion.

II. JURISDICTION AND VENUE

4. This Court has jurisdiction under **28 U.S.C. § 1331**, as this case arises under the Constitution and federal laws of the United States.
 5. Venue is proper in this Court under **28 U.S.C. § 1391(b)** because I reside in Lansing, Michigan, and the harm occurred within this district.
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III. PARTIES

6. **Plaintiff:** Robert P. Hollingsworth III, an African-American male residing at 924 W. Ionia St Apt 3, Lansing, MI 48915.
 7. **Defendant Scott Bessent:** Secretary of the Treasury, responsible for authorizing the cutting of federal funds without Congressional approval, which resulted in Plaintiff's government utility assistance check being reduced from 67.00to67.00to52.00 on February 5, 2025. This reduction occurred during an extremely cold winter, leaving Plaintiff at risk of electrical shutoff with no explanation.
 8. **Defendant Joshua Fisher:** Director of the Office of Administration (OA), who facilitated the cutting of federal funds without ensuring compliance with constitutional and legal requirements.
 9. **Defendant Executive Office of the President (EOP):** The entity within the White House responsible for overseeing the cutting of federal funds and implementing policies that bypass Congress and harm vulnerable populations.
 10. **Defendant United States Department of the Treasury:** The federal agency responsible for managing federal disbursements, including Social Security, Medicare, and other programs critical to the Plaintiff's survival.
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IV. FACTUAL ALLEGATIONS

11. On **January 20, 2025**, the Executive Office of the President (EOP), under the direction of the Trump administration, began cutting federal funds without Congressional approval. This action violated the **Appropriations Clause** of the Constitution (Article I, Section 9), which grants Congress exclusive authority over federal funds and expenditures.
 12. As a result of these cuts, my monthly utility assistance check was reduced from 67.00to67.00to52.00 on **February 5, 2025**. This reduction occurred during an extremely cold winter, when my utility bills are significantly higher than in the summer months. I have been unable to afford my utility bill and now face the risk of electrical shutoff, which threatens my health and safety.
 13. The cutting of federal funds was facilitated by **Joshua Fisher**, Director of the Office of Administration (OA), and authorized by **Scott Bessent**, Secretary of the Treasury. These actions were taken without Congressional oversight or approval, undermining the constitutional separation of powers.
 14. The Defendants' actions are part of a broader pattern of discriminatory actions by the Trump administration, including the dismantling of DEI programs through executive orders such as **"Ending Radical and Wasteful Government DEI Programs"**. These actions disproportionately harm people of color and marginalized communities, while privileging white individuals and entities.
 15. The Defendants' actions create a **racially discriminatory system** where federal funds and programs are weaponized against vulnerable populations, particularly people of color. This violates the **Equal Protection Clause** of the Fourteenth Amendment and federal civil rights laws.
 16. The Defendants' actions also violate the **Due Process Clause** of the Fifth Amendment, as they risk depriving me and others reliant on federal benefits of life-sustaining funds without due process protections.
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V. LEGAL CLAIMS

Count I: Violation of Separation of Powers (Article I, Section 9)

17. By cutting federal funds without Congressional approval, the Defendants violated the **Appropriations Clause** of the Constitution, which grants Congress exclusive authority over federal funds and expenditures.

Count II: Violation of Due Process (Fifth Amendment)

18. The Defendants' actions risk depriving me and others reliant on federal benefits of life-sustaining funds without due process protections, in violation of the **Fifth Amendment**.

Count III: Racial Discrimination (Fourteenth Amendment Equal Protection Clause)

19. The Defendants' actions reflect **systemic racial discrimination** by dismantling DEI programs and disproportionately harming people of color, in violation of the **Equal Protection Clause** of the Fourteenth Amendment.

Count IV: Violation of Federal Privacy Laws

20. The Defendants' grant of access to sensitive Treasury systems containing personal data violates my right to privacy under federal statutes protecting such information.

Count V: Exception to Sovereign Immunity

21. The Defendants, including the **United States Department of the Treasury** and the **Executive Office of the President (EOP)**, are not entitled to sovereign immunity in this case because they knowingly violated the United States Constitution and acted outside their lawful authority.
22. The cutting of federal funds without Congressional approval violates the **Appropriations Clause**(Article I, Section 9), the **Due Process Clause** (Fifth Amendment), and the **Equal Protection Clause** (Fourteenth Amendment) of the Constitution. These actions were taken knowingly and intentionally, without regard for the constitutional limits on their authority.
23. Additionally, the Plaintiff seeks **injunctive relief** and **declaratory judgments**, which are not barred by sovereign immunity. The Plaintiff is not seeking monetary damages from the federal government itself but rather from individual Defendants in their personal capacity for their unconstitutional actions.
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VI. RELIEF REQUESTED

WHEREFORE, Plaintiff respectfully requests that this Court grant the following relief:

1. **Compensatory Damages:** Award Plaintiff \$150 million in compensatory damages for emotional distress, harm to reputation, and infringement of constitutional rights.
2. **Punitive Damages:** Award punitive damages against Defendants Scott Bessent and Joshua Fisher for their reckless disregard of Plaintiff's constitutional rights.
3. **Declaratory Judgment:** Issue a declaratory judgment that Defendants' actions violate the United States Constitution, including the Fifth and Fourteenth Amendments.
4. **Injunctive Relief:** Enjoin Defendants from further cutting federal funds without Congressional approval and from allowing DOGE access to federal payment systems and sensitive personal data.

5. **Attorney's Fees and Costs:** Award Plaintiff reasonable attorney's fees and costs under applicable federal statutes.
 6. **Other Relief:** Grant any other relief that the Court deems just and proper.
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VII. DEMAND FOR JURY TRIAL

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff demands a trial by jury on all issues so triable.

VIII. SIGNATURE AND VERIFICATION

I declare under penalty of perjury that the foregoing is true and correct.

Robert P. Hollingsworth III
924 W. Ionia St Apt 3
Lansing, Michigan 48915
(517) 214-9329

